

CARDD MEPA ROUTING MEMO

То:	Mark Bostrom
Through:	Demi Blythe
From:	Mary Hendrix
Re:	No MEPA Needed Decisions for Conservation Bureau District Development Grants
Project Sponsor:	Pondera County Conservation District
Name of Project:	Pondera County Conservation District Resource Development Grant
Agreement No:	RD-CCD-652
Memo:	
DNRC can issue a No MEPA Needed Decision Notice for the Conservation Bureau Pondera County Conservation District Resource Development Grant. The actions of the grant funding are administrative and fall 'Actions of a Special Nature' (attached). SIGNATURE REQUIRED	

Post for _30_ Days on DNRC's Environmental Docs page.

_/s/DEB__ MEPA/NEPA Coordinator Review

Division Administrator Signature

_ Bureau Chief Review

File

MUB

DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION



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DECISION MEMO ACTIONS OF A SPECIAL NATURE

Pondera County Conservation District Resource Development Grant
July 1, 2021 – June 30, 2023
Pondera County Conservation District
Administrative
Conrad, MT
Pondera County

PURPOSE AND NEED

The Montana Salinity Control Association (MSCA) is attached administratively to the Pondera County Conservation District (PCCD) as the fiscal agent. MSCA was established as a satellite of Montana's Conservation Districts with the purpose of reclaiming and preventing saline seeps and other agricultural-related water quality problems, on an individual farm and/or watershed basis. MSCA originated in 1979 in nine counties but has since expanded to serve 34 counties via their respective Conservation Districts.

MSCA's Mission Statement: "Empower people to improve the long-term productivity and quality of soil and water resources."

MSCA receives baseline funding (\$273,000/fiscal year) that is administered by the MT Department of Natural Resources and Conservation (DNRC), Conservation and Resource Development Division (CARDD), Conservation Districts Bureau (CDB) from mineral taxes and the General Fund. The CDB administers the annual allocation to MSCA and provides legal and financial assistance. The allocation is approved biennially as a Line Item by the MT State Legislature.

Since the Pondera County Conservation District (PCCD) is the fiscal agent that receives the DNRC funding, the five MSCA staff members are PCCD employees. Three of the staff are full-time and two are part-time. Both fieldwork and office duties are conducted by three of the staff, and two of the staff members have administrative-only duties. See the last page of this document for details.

The saline seep reclamation process contributes to the economic prosperity of the State's agricultural sector by improving agricultural production, soil and water quality and bringing

federal dollars for saline control implementation to the local economy. MSCA has successfully competed for federal funds to address salinity and soil health. In addition, MSCA generates revenue through other sources.

The MSCA technical field team conducts a shallow ground water investigation to identify the recharge areas that cause the individual saline problems and that will require a site-specific land-use management change for each saline project. Each year MSCA receives requests for technical assistance from Conservation Districts, private landowners/operators, USDA Natural Resources Conservation Service (NRCS) personnel, irrigation districts and watershed groups. While the geographical emphasis changes across Eastern MT, the overall requests remain consistent, indicating the need to maintain the MSCA technical assistance program.

MSCA is involved in the organization of individual and watershed-scale saline projects working through local Conservation Districts, with assistance from the DNRC-CARDD staff. MSCA provides significant technical assistance in twenty salinity-based watershed projects ranging from 2,000 acres to over 600,000 acres. Some projects are still in progress, and some have been completed. After project completion, MSCA continues to maintain records and provide technical support and data interpretation upon request. Each watershed project has a local advisory group that contributes funds and/or provides coordination between landowners and technical agencies.

MSCA coordinates with state and federal agencies to utilize and adapt their technical/financial assistance and project funding programs to address nonpoint source pollution and other resource concerns. Federal programs within the United States Department of Agriculture (USDA) and the Environmental Protection Agency (EPA) are utilized to assist individual producers in implementing the remediation methods MSCA recommends for successful saline seep reclamation.

In 2019, MSCA's comprehensive application to the 5-year Regional Conservation Partnership Program (RCPP) was accepted. In order to qualify for the federally funded RCPP, MSCA had to facilitate matching funds from within the State of Montana. The line-item DNRC money qualified as that matching requirement. The RCPP is a nationally competitive program that earmarks federal funds for local use. Under the RCPP MT Saline Seep Reclamation Project, funding through the Natural Resources Conservation Service (NRCS) Environmental Quality Incentive Program (EQIP) will be used over a five-year period (2019-2023) for new salinity projects in Montana. Without the federal financial assistance, few producers have the means to pay for the ground water investigation and to implement the remediation techniques. MSCA staff will complete a total of approximately 50 ground water investigations with site-specific recommendations within the project timeframe of 2019-2023. As of July 2021, 27

individual saline seep reclamation plans have been completed. When eligible, MSCA will complete the requirements for an expansion of the RCPP MT Saline Seep Reclamation Project.

For each saline seep project, MSCA staff conducts an initial site review with the producer to determine whether saline seeps are caused by current farming practices or rule out those that form naturally with little to no influence from surface land use. If farming practices cause a saline seep, MSCA can conduct a ground water investigation, installing a grid of shallow ground water monitoring wells and an elevation survey of wells and relevant surface points to determine ground water flow direction to isolate recharge area(s).

After the field investigation, the MSCA staff assesses the information to create a saline seep reclamation plan, which includes a map delineating the recharge and discharge areas targeted for land-use change from annual to perennial cropping in the recharge area. Copies of the plan are provided to the producer and to the local NRCS office. The producer can then proceed with development of an EQIP contract to implement conservation practices to treat the identified recharge area.

MSCA staff regularly conducts multiple saline seep education and outreach events (such as presentations to government agencies, professional organizations, and/or landowners) per year. An annual newsletter is created and distributed throughout the State, and the website www.montanasalinity.com is updated regularly. MSCA also distributes both an extensive brochure and a less-detailed flyer that describe the program coordination and technical assistance available.

MSCA advocates for the improvement of soil health and educates producers on the benefits of diverse crop rotations. Cover crops and/or perennial crops can be incorporated in lieu of the entire or a portion of a summer fallow period (when vegetative growth is allowed to store soil moisture and control weeds). The cover cropping concept also serves as a method to reduce recharge to saline seeps. The diverse cover crop species in a planted mixture will increase soil microbial activity to improve crop yields and quality over time, improve soil sustainability, increase water holding capacity and economic viability. MSCA staff participates and helps organize soil health educational programs and tours each year.

MSCA staff provides youth education programs for K-12 as requested. MSCA staff also presents adult education programs through requests from Extension Service, Conservation Districts, MT Agricultural Experiment Station and private industry.

MT State University has documented evidence that low pH (acidic) soil conditions are present as a result of long-term application of Nitrogen fertilizer in over 23 Montana

counties. Soil acidity reduces plant growth, which results in reduced moisture use and increased percolation. These conditions increase recharge to the ground water and exacerbate saline seep development. Where soil acidity problems are suspected, MSCA has the equipment to identify acidic soils and differentiate them from saline soils. The MSCA emphasis will be prevention of soil acidity so it does not become as prevalent a problem as salinity in MT.

MSCA has a seat on the MT Ground Water Steering Committee, as appointed by the MT State Governor, and represents CD interests and concerns. The GW Steering Committee provides guidance to the MT Bureau of Mines & Geology (MBMG) as they conduct two programs. The Ground Water Assessment Program (GWAP) provides a statewide monitoring process. The Ground Water Investigation Program (GWIP) conducts site specific investigations to either address water resource concerns or identify new ground water sources for private, public, agricultural and/or industrial uses. The GW Steering Committee meets 2-3 times each year.

Explanation of the decision(s) that must be made regarding the proposed action (i.e.: approve grant or loan and provide funding)

DNRC will approve the grant to provide funding for the Pondera County Conservation District Resource Development Grant for the Saline Seep Abatement Activities through the Montana Salinity Control Association.

DNRC is not required to prepare an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) for actions that qualify for a CATEGORICAL EXCLUSION or justified by a PROGRAMMATIC REVIEW; or are ACTIONS OF A SPECIAL NATURE (ARM 36.2.523(5)). These actions are subject to review for EXTRAORDINARY CIRCUMSTANCES that would require an EA or an EIS.

ACTIONS OF SPECIAL NATURE (ARM 36.2.523)

Administrative actions: routine, clerical or similar functions of a department, including but not limited to administrative procurement, contracts for consulting services, and personnel actions.
\square Minor repairs, operations, or maintenance of existing equipment or facilities.
\square Investigation and enforcement: data collection, inspection of facilities or enforcement of environmental standards.
\square Ministerial actions: actions in which the agency exercises no discretion, but rather acts upon a given state of facts in a prescribed manner.

 \square Actions that are primarily social or economic in nature and that do not otherwise affect the human environment.

The project listed above meets the definition of Actions of a Special Nature, Categorical Exclusion or Programmatic Review including specified conditions and Extraordinary Circumstances.

Prepared By: Name: Mary Hendrix Date: 8/12/2021

Approved By:

Name: Mark Bostrom

DocuSigned by:

Title: CARD Division Administrator

Signature: Mark W Bostrom Date: 8/13/2021